

Exhibit 29

(Excerpt)

1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF VIRGINIA

3 ALEXANDRIA DIVISION

4 - - - - - x

5 UNITED STATES, et al., :

6 Plaintiffs, :

7 v. : Case No.

8 GOOGLE, LLC, : 1:23-cv-00108

9 Defendant. :

10 - - - - - x

Monday, March 4, 2024

Washington, D.C.

11 Job No. CS6484199

12 Videotaped Deposition of:

13 WAYNE D. HOYER, Ph.D.,

14 called for oral examination by counsel for the

15 Defendant, pursuant to notice, at the United States

16 Department of Justice, Antitrust Division, 450 Fifth

17 Street, Northwest, Suite 11-248, Washington,

18 D.C. 20001, before Christina S. Hotsko, RPR, CRR, of

19 Veritext Legal Solutions, a Notary Public in and for

20 the District of Columbia, beginning at 8:33 a.m.,

21 when were present on behalf of the respective

22 parties:

1 Q. And when I -- I should have clarified.

2 Do you understand what the term "ad tech"
3 means?

4 A. I do.

5 Q. What is your understanding of that term?

6 A. Ad tech is the different tools to buy
7 advertising for display -- programmatic display
8 advertising.

9 Q. Okay. And again, you've never conducted
10 a survey of advertisers before, right?

11 MR. SHEANIN: Asked and answered.

12 THE WITNESS: That is correct.

13 BY MS. DEARBORN:

14 Q. Outside of your work on this case, had
15 you ever heard of Advertiser Perceptions before?

16 A. You mean the firm?

17 Q. Yes.

18 A. No.

19 Q. So the first time you heard of Advertiser
20 Perceptions was in connection with this
21 litigation?

22 A. That's correct.

1 respondents for a situation like this, when you
2 want to survey advertisers.

3 Q. Okay. Did you do anything yourself to
4 test the quality of the Advertiser Perceptions
5 AdPROs panel?

6 A. I didn't have the -- I did not do
7 anything specifically, but there wasn't data in
8 the report for me -- to allow me to do that.

9 Q. But you didn't talk to anyone in
10 Advertiser Perceptions, for example?

11 A. No, I did not.

12 Q. Did you do any research into
13 Advertiser Perceptions apart from what is in
14 Dr. Simonson's report?

15 A. No, I did not.

16 Q. Okay. Did you do any investigation
17 yourself to ascertain the quality of
18 Advertiser Perceptions' methodology for assembling
19 a panel?

20 A. No, because it wasn't germane to my
21 opinion. My opinion was more on the result of
22 what they did than what was in the report.